

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,
v
Case No.: 2:25-mc-50623
(related to 24CR20532)

WILLIAM A. SMITH,

Defendant, Hon. Susan K. DeClercq

and

DETROIT RIVERFRONT
CONSERVANCY, INC., et al,

Garnishee.

/

STIPULATED ORDER TO EXTEND DEFENDANT'S DEADLINE

NOW COME the United States of America ("Plaintiff"), by and through Assistant United States Attorney, Jessica A. Nathan, and the Defendant, William A. Smith ("Defendant"), by and through his counsel, Gerald K. Evelyn, (collectively the "Parties") do hereby enter this stipulation to modify the deadline for the Defendant to file an objection pursuant to 28 U.S.C. § 3205(c)(5) to sixty (60) days from the date of the Garnishees' filed or receipted Answer.

The Parties recognize there are three outstanding Writs to the following Garnishees: (1) Paychex, Inc., (2) the Detroit Riverfront Conservancy, Inc. ("DRFC"), and (3) American Funds aka Capital Group Retirement Plan (collectively

the “Garnishees”). The Parties agree the Defendant’s right to object under 28 U.S.C. § 3205(c)(5) attaches to each Garnishee Answer and may result in multiple, but disparate deadlines. Example: Paychex Answer is filed/receipted June 23, 2025, and DRFC Answer is filed/receipted June 26, 2025, resulting in the extended objection deadlines of August 22, 2025, for Paychex, and August 25, 2025, for DRFC.

Therefore, the Parties stipulate the Defendant's deadline to file an objection to the Writs of Garnishment in this matter for property held, maintained, or possessed by the Garnishees is modified from twenty (20) days to sixty (60) days.

By entering into this Stipulation, Defendant does not waive, and expressly reserves, any procedural or substantive objection to any Writ of Garnishment to the fullest extent permitted by law.

All other deadlines under 28 U.S.C. §§ 3202 and 3205 shall remain the same.

So stipulated:

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United States Attorney

s/ Jessica A. Nathan
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Dated: June 30, 2025

s/ Gerald K. Evelyn (with consent)
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Counsel for Defendant

Dated: June 30, 2025

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ORDER GRANTING DEADLINE EXTENSION

The Court having been advised of the premises, and with the stipulation of the parties, does hereby order that the Defendant is authorized to file an objection under 28 U.S.C. § 3205(c)(5) **within sixty (60) days** of a Garnishee's filed or received Answer. This extension applies to each Garnishee Answer.

SO ORDERED.

Dated: July 1, 2025

/s/Susan K. DeClercq
Honorable Susan K. DeClercq
United States District Court